



BOULT • CUMMINGS  
CONNERS • BERRY PLC

REC'D TN  
REGULATORY AUTH.

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NOV 13 PM 3 57

November 13, 2001  
OFFICE OF THE  
EXECUTIVE SECRETARY

David Waddell, Esq.  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Complaint of BellSouth Telecommunications, Inc. Regarding the  
Practices of Global Crossing Telecommunications, Inc. in the Reporting of  
Percent Interstate Usage for Compensation for Jurisdictional Access  
Services  
Docket No. 01-00913

Dear David:

Please accept for filing the original and thirteen copies of the Motion for an  
Extension of Time filed on behalf of Global Crossing Telecommunications, Inc. in the above-  
captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

*Henry Walker*  
Henry Walker

HW/nl  
Attachment  
c: Parties

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

Re: Complaint of BellSouth	)	
Telecommunications, Inc. Regarding the	)	Docket No. 01-00913
Practices of Global Crossing	)	
Telecommunications, Inc. in the Reporting of	)	
Percent Interstate Usage for Compensation	)	
for Jurisdictional Access Services.	)	

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**MOTION FOR EXTENSION OF TIME**

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Global Crossing Telecommunications, Inc. ("Global Crossing") requests a two-day extension of time for filing discovery and a list of issues in the above-captioned proceeding. Counsel for BellSouth Telecommunications, Inc. ("BellSouth") states that she does not oppose this request as long as BellSouth receives an additional two days to respond to discovery.

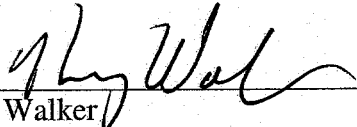
As grounds for the request, Global Crossing states that the parties filed a Joint Motion on Friday, November 9, 2001, asking that the procedural schedule set by the Hearing Officer be suspended and that the Hearing Officer convene a pre-hearing conference for the purpose of setting a revised schedule based on the parties' best expectations of the time necessary to reach an expeditious conclusion of this matter.

Since Monday, November 12, 2001, was a state holiday, the Hearing Officer has not yet notified the parties whether or not the Joint Motion has been granted. Although Global Crossing anticipates that the unopposed Joint Motion will be granted, Global Crossing requests this two-day extension in case the Hearing Officer denies the Joint Motion and Global Crossing is required to make filings which would otherwise be due today, November 13, 2001.

Counsel for BellSouth states that BellSouth does not oppose this request with the understanding that, if the Joint Motion is not granted, two days will be added to the time provided BellSouth to respond to discovery. Global Crossing has agreed to that condition.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC


By:   
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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 13<sup>th</sup> day of November, 2001.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

Jonathon Wike, Esq.  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37219

  
Henry Walker